

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 2:24-CR-0081-TOR-1

Plaintiff,

v.

PROTECTIVE ORDER

NINA RAE TATSHAMA-
MARCHAND,

Defendant.

BEFORE THE COURT is the United States' Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information. ECF No 18. For good cause shown, the Motion is GRANTED.

THEREFORE, IT IS HEREBY ORDERED:

1. The United States' Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information, ECF No. 18, is **GRANTED**.

2. The United States is authorized to disclose the discovery including sensitive information and materials (hereinafter "Discovery") in its possession pursuant to the discovery obligations imposed by this Court.

1 3. Government personnel and counsel for Nina Rae Tatshama-Marchand
2 (“Defendant”), shall not provide, or make available, the sensitive information in the
3 Discovery to any person except as specified in the Order or by approval from this
4 Court. Counsel for Defendant and the Government shall restrict access to the
5 Discovery, and shall only disclose the sensitive information in the Discovery to their
6 client, office staff, investigators, independent paralegals, necessary third-party
7 vendors, consultants, and/or anticipated fact or expert witnesses to the extent that
8 defense counsel believes is necessary to assist in the defense of their client in this
9 matter or that the Government believes is necessary in the investigation and
10 prosecution of this matter.
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14 4. Third parties contracted by the United States or counsel for Defendant
15 to provide expert analysis or testimony may possess and inspect the sensitive
16 information in the Discovery, but only as necessary to perform their case-related
17 duties or responsibilities in this matter. At all times, third parties shall be subject to
18 the terms of the Order.
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21 5. Discovery in this matter will be available to defense counsel via access
22 to a case file on USA File Exchange. Counsel for Defense may download Discovery
23 from USA File Exchange and shall exercise reasonable care in ensuring the security
24 and confidentiality of the Discovery by electronically storing the Discovery on a
25 password-protected or encrypted storage medium, including a password-protected
26 computer, or device. If Discovery is printed, Counsel must also exercise reasonable
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1 care in ensuring the security and confidentiality of the Discovery by storing copies
2 in a secure place, such as a locked office, or otherwise secure facility where visitors
3 are not left unescorted
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5 6. All counsel of record in this matter, including counsel for the United
6 States, shall ensure that any party, including the Defendant, that obtains access to
7 the Discovery is advised of this Order and that all information must be held in strict
8 confidence and that the recipient may not further disclose or disseminate the
9 information. Any other party that obtains access to, or possession of, the Discovery
10 containing discovery information once the other party no longer requires access to
11 or possession of such Discovery shall promptly destroy or return the Discovery once
12 access to Discovery is no longer necessary. No other party that obtains access to or
13 possession of the Discovery containing sensitive information shall retain such access
14 to or possession of the Discovery containing sensitive information unless authorized
15 by this Order, nor further disseminate such Discovery except as authorized by this
16 Order or the further Order of this court. For purposes of this Order, “other party” is
17 any person other than appointed counsel for the United States or counsel for
18 Defendant.
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23 7. All counsel of record, including counsel for the United States, shall
24 keep a list of the identity of each person to whom the Discovery containing sensitive
25 information is disclosed. Neither counsel for Defendant nor counsel for the United
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1 States shall be required to disclose this list of persons unless ordered to do so by the
2 Court.

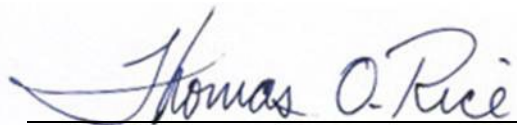
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4 8. Upon entry of a final order of the Court in this matter and conclusion
5 of any direct appeals, government personnel and counsel for Defendant shall retrieve
6 and destroy all copies of the Discovery containing sensitive information, except that
7 counsel and government personnel may maintain copies in their closed files
8 following their customary procedures.
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10 9. Government personnel and counsel for Defendant shall promptly report
11 to the Court any known violations of this Order.
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13 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
14 this Order and provide copies to counsel.
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16 **DATED** July 12, 2024.




THOMAS O. RICE
United States District Judge